

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

2019 JAN 16 PM 3:29
U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

) INDICTMENT
JUDGE GWIN

Plaintiff,

) 1 : 19 CR 28

v.

MATTHEW MULFORD,

) Title 21, Sections 841(a)(1),
(b)(1)(C), (h), 846 and 853,
United States Code; Title 18,
Sections 982(a)(1) and 1956(h),
United States Code

Defendant.

) CASE NO.

COUNT 1

(Conspiracy to Distribute Controlled Substances, in violation of 21 U.S.C. §§ 841(a)(1),
(b)(1)(C), and 846)

The Grand Jury charges:

1. From on or about January 1, 2015 to on or about October 4, 2018, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MATTHEW MULFORD, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree to distribute and possess with the intent to distribute mixtures or substances containing a detectable amount of alprazolam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and 846.

COUNT 2

(Distributing Controlled Substances by Means of the Internet, in violation of 21 U.S.C. § 841(h))

The Grand Jury further charges:

2. From on or about January 1, 2015 to on or about October 4, 2018, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MATTHEW MULFORD, and others known and unknown to the Grand Jury, did knowingly and intentionally deliver, distribute, and dispense a controlled substance by means of the internet: to wit, Defendant used dark net marketplace accounts, encrypted communication applications, and a TOR hidden service site to distribute controlled substances over the internet to customers, in violation of Title 21, United States Code, Sections 841(h) and (b)(1)(C).

COUNT 3

(Conspiracy to Launder Money, in violation of 18 U.S.C. § 1956(h))

The Grand Jury further charges:

3. From on or about January 1, 2015 to on or about October 4, 2018, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MATTHEW MULFORD, and others known and unknown to the Grand Jury, did knowingly, and intentionally conspire to commit money laundering, in violation of Title 18, Section 1956(a)(1).

4. It was a part and object of the conspiracy that Defendant MATTHEW MULFORD, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, to wit: conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1)

and 846, knowing that the transactions were designed in whole and in part to conceal and disguise the location, source, ownership and control of the proceeds of said specified unlawful activity, and while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

5. It was part and object of the conspiracy that the Defendants:
 - a. Utilized digital currency (such as Bitcoin) to conceal and disguise the nature, location, source, ownership and control of the drug proceeds;
 - b. Maintained and controlled digital currency addresses through which customers paid them in exchange for narcotics;
 - c. Used digital currency exchanges to convert cryptocurrency drug trafficking proceeds into official fiat currency;
 - d. Utilized mixing and tumbling services for the digital currency transactions. These mixing and tumbling services assisted them in attempting to obscure the historical trail of digital currencies transferred from drug customers to Defendant; and
 - e. Used dark net marketplace escrow services.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE

The Grand Jury further charges:

6. The allegations contained in Counts 1 and 2 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853. As a result of

these offenses, Defendant MATTHEW MULFORD shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such offenses; and, any and all of the defendant's property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offenses; including, but not limited to, the following:

- a. 1.46355556 Bitcoin recovered from MATTHEW MULFORD's electrum wallet on or about October 3, 2018.
- b. HP laptop Model 15I112dx, Serial Number 5CD751COVO, used by MATTHEW MULFORD and recovered on or about October 3, 2018.

7. The allegations contained in Count 3 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(1). As a result of this offense, Defendant MATTHEW MULFORD shall forfeit to the United States all property, real and personal, involved in such offense, and all property traceable to such property; including, but not limited to, the following:

- a. 1.46355556 Bitcoin recovered from MATTHEW MULFORD's electrum wallet on or about October 3, 2018.
- b. HP laptop Model 15I112dx, Serial Number 5CD751COVO, used by MATTHEW MULFORD and recovered on or about October 3, 2018.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.